

**The District of Columbia
Waiver Request
Workforce Investment Act
Federal Percentage Expenditure Mandate for Out-of-School Youth**

The Department of Employment Services (DOES), which has been designated by the Mayor of the District of Columbia as the administrative entity for the Workforce Investment Act (WIA), and District of Columbia Workforce Investment Council (DCWIC), are requesting a general waiver of the legal requirement that mandates a minimum of 30% of federal expenditure be applied to out-of-school youth activities. The proposed waiver will allow DOES to have greater flexibility to maximize WIA authorized service delivery and service impact for both out-of-school and in school youth.

The granting of this waiver will support DOES in cultivating a demand driven workforce and will align efforts to actualize the national strategic direction of enhanced service integration, a more efficient use of WIA dollars and a heightened return on training investments that can be applied to youth most in need. The granting of this waiver will also result in better aligning programs towards common measures.

As a single service entity, the District of Columbia's structure for WIA consists of the Department of Employment Services (DOES), which is responsible for providing the administrative and fiscal management systems for program implementation, and the District of Columbia Workforce Investment Council (DCWIC), which performs policy functions and represents the Mayor's economic development priorities. The planning and delivery of services are administered by the DOES Associate Director of One-Stop Career Center Operations and Youth Programs.

This waiver request follows guidelines identified in WIA Section 189(i)(4)(B) (29 USCA Section 2939(i)(4)(B)) and WIA Final Regulations at 20 CFR Section 661.420(c).

1. Statutory Regulations to be Waived:

WIA Section 129(c)(4)(A) and 20 CFR Part 664.320 requires that at a minimum, 30 percent of the funds shall be used to provide youth activities to out-of-school youth.

The District of Columbia is requesting that it be allowed to waive the stated federal percentage expenditure mandated for out-of-school youth.

2. State or Local Statutory Regulatory Barriers:

There are no state statutory or regulatory barriers to impede the proposed waiver and DOES policies and the DCWIC are in compliance with the current Federal guidelines. Upon notification of approval, if this waiver request is granted, DOES policy will be amended to comply with the terms of the waiver.

3. Goals to be Achieved by the Waiver:

The goal of this request is to insure that funds may be applied to the neediest youth and that services better align with national strategic priorities by maximizing service provisions that insure 'no child is left behind'. The resulting flexibility obtained through the receipt of this waiver will allow the District to insure that all WIA eligible youth are well prepared to meet the workforce requirements of the local economy and ultimately attain the Mayor's goal of resident self sufficiency.

Although out of school youth remain a priority, benefits gained through their WIA youth eligibility is short lived as many become eligible for WIA Adult services, and thus are able to benefit exclusively from the Adult program. Pending local legislation has also dedicated funds to serve out-of-school youth as a result of an increase in juvenile homicides and incidences of youth violence in the District since 2003. Federal funds will be leveraged to assist this population through transitional programs that lead to unsubsidized employment or will position them to benefit fully from WIA Adult services if applicable.

The District also has a significant cohort of disadvantaged in school youth that are at great risk for being unable to pursue college or career bound activities that would customize their skills enough to be marketable within a demand driven economy. To address this growing concern, the District has partnered with its community college to establish "Career Academies" in public high schools that will encourage WIA eligible youth to access career bound training and support services necessary to address workforce barriers.

The ability to leverage federal funds that become a front end investment for in school youth will be critical to develop and maintain pre-emptive programs that better position this vulnerable population to receive a strategic continuum of services over a longer period of time and more effectively prepare 14-17 year old in-school population for the employer driven workplace of the future.

4. Programmatic Outcomes to be Achieved by the Waiver:

- More efficient use of WIA funding
- Increased service impact and sustainability
- Enhanced service integration with workforce, education and economic development partners
- Maximizes service delivery to full range of neediest youth
- Enhanced program accountability and efficiency through the advent of common measures

5. State Local Statutory or Regulatory Barriers:

There are no existing state or local statutory or regulatory barriers to implementation of this waiver request.

6. Individuals Impacted by the Waiver:

The waiver can positively impact all WIA eligible youth. These customers will receive the type of services that most closely and quickly meet their individualized needs without unnecessary delay, or funding restrictions. Service efficacy increases as needy youth are provided services as early as possible that can be reinforced over an extended period of time.

The waiver can positively impact DOES WIA administrators by increasing discretionary application of youth funds based on the changing needs and priorities of District youth and thus insuring targeted services geared towards youth most in need.

7. Process Used to Monitor Progress in Implementing the Waiver:

DOES has in place a monitoring and performance accountability system that measures and evaluates result for employers and jobseekers accessing the District's network of One-Stop Career centers. On a monthly and quarterly basis, DOES analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, program monitors conduct onsite quarterly technical assistance reviews designed to assure that contract requirements are being met for all WIA programs. On an annual basis, comprehensive monitoring is conducted onsite utilizing outcome reports generated from DOES's District wide database. Should this waiver request be granted, DOES will ensure regular review of the impact of waiving the federal percentage expenditure mandated for out-of- school youth.

8. Process for Notice of Local Boards and Opportunity to Comment:

DOES sought the input of DC WIC during the development of the waiver request. DOES administrators met to review their expenditure levels and program needs and ultimately received unanimous support for the submission of this waiver. Once the waiver document is finalized, it will be posted on the public web site maintained by DOES to allow for public comment on its content and potential impact. In addition a copy of the waiver will be available for public inspection at DOES offices, and electronic copies of the waiver will be sent via e-mail to workforce centers.